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2019 PERIODIC REVIEW REPORT SPECIAL METALS CORPORATION DUNKIRK, NEW YORK NYSDEC Site Number 907031

March 11, 2019

File No. 21.0056196.50



PREPARED FOR:

Special Metals Corporation
Dunkirk, New York

GZA GeoEnvironmental of New York

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VIA EMAIL

March 11, 2019
File No. 21.0056196.50

Mr. David Szymanski
New York State Department of Environmental Conservation
Division of Environmental Remediation
270 Michigan Avenue
Buffalo, New York 14203
EMAIL: david.szymanski@dec.ny.gov

Re: 2019 Periodic Review Report (NYSDEC Site No. 907031)
Special Metals Corporation
100 Willowbrook Avenue
Dunkirk, New York

Dear Mr. Szymanski:

GZA GeoEnvironmental of New York (GZA), on behalf of Special Metals Corporation (SMC), provides this Periodic Review Report (PRR) for the Specialty Metals Corporation Site (Site), located at 100 Willowbrook Avenue, Dunkirk, New York. The Site was designated by the New York State Department of Environmental Conservation (NYSDEC) as Site number 907031 and was remediated in 2007 by SMC under Order on Consent No. B9-0737-07-02.

This is the second PRR to be submitted for the Site since the NYSDEC issued a Satisfactory Completion of Remediation Letter dated February 1, 2018. As part of the post-remedial obligations under the Site Management Plan, periodic Site inspections and reporting are required. GZA prepared this PRR for reporting period October 31, 2017 to February 8, 2019 in general conformance with the guidelines provided to SMC by NYSDEC in a reminder notice letter dated February 27, 2019.

If you have any questions or need additional information, please call Jim Richert at (716) 844-7048.

Sincerely,

GZA GEOENVIRONMENTAL OF NEW YORK

James J. Richert, P.G.
Senior Project Manager

Bart A. Klettke, P.E.
Principal

Cc: Mike Guziec (Special Metals Corporation)
Eugene Melnyk (NYSDEC Region 9)



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FIGURES

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APPENDIX A AOC INSPECTION FORMS

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1.0 EXECUTIVE SUMMARY

1.1 BACKGROUND

The Special Metals Corporation (SMC) facility in Dunkirk, N.Y. is approximately 8-acres in size, 2.0 acres of which is referred to as the “Area of Concern” (AOC). The AOC was the subject of an environmental cleanup and remains subject to a Site Management Plan (SMP) which, among other things, requires periodic Site inspections and reporting.

In August 2006, during a building expansion project, impacted soil containing hazardous concentrations of PCBs was encountered at the facility. Interim Remedial Measure (IRM) activities were performed in 2007 and included excavation and off-site disposal of the impacted soils from six excavations within the AOC. A limited volume of impacted soil remains within the AOC and is located beneath existing structures and at the western property boundary. Remedial excavations were backfilled with clean crushed stone and covered by asphalt pavement and/or clean topsoil with a vegetative cover. Certain precautions and management of remaining contamination are required through implementation of Institutional and Engineering Controls (IC/ECs) put in place for the AOC.

The IC/ECs for the AOC are as follow:

Institutional Controls:

- The Site may be used for commercial or industrial use in accordance with the SMP;
- Restriction of the use of groundwater as a source of potable or process water without necessary water quality treatment; and
- Compliance with the NYSDEC-approved SMP.

Engineering Controls:

- Cover System – The cover system is comprised of a minimum of 24 inches of crushed stone covered by either vegetated clean topsoil, asphalt pavement, concrete sidewalks, and/or concrete building slabs;
- Security Fencing – The AOC is and shall remain surrounded by a minimum 8-foot high chain link security fence.

An SMP is being implemented by SMC to protect Site users from exposure to the remaining covered contamination, to maintain the IC/ECs, and to document compliance with the Environmental Easement (EE).

1.2 EFFECTIVENESS OF THE REMEDIAL PROGRAM

GZA confirmed that the Site cover system is in place, complete, and in good condition. Vegetative cover was also observed to be acceptable, with no bare patches observed. The Site perimeter fence was confirmed present, completely surrounding the Site, and in good condition.

The Site engineering controls remain in place, in acceptable condition, and continue to be effective at meeting the Site’s Remedial Action Objectives (RAOs).



1.3 COMPLIANCE

GZA observed the Site as in compliance with the SMP. The Institutional Controls and Engineering Controls (IC/ECs) remain in place.

1.4 RECOMMENDATIONS

GZA and SMC recommend no changes to the SMP nor to the frequency of Site inspections and PRR submittals. Implementation of the SMP, including the maintenance of the Site perimeter fence and Site cover system, will continue as prescribed in the SMP.

2.0 SITE OVERVIEW

2.1 SITE LOCATION AND FEATURES

The SMC facility is an active specialty steel manufacturing facility located on approximately 8-acres of land located at 100 Willowbrook Avenue in the City of Dunkirk, County of Chautauqua, New York. The facility is bounded by the former Al-Tech Specialty Steel Site to the north, east and west, and by Willowbrook Avenue to the south beyond which are residential homes (see **Figure 1**). The boundaries of the 2.0-acre Area of Concern (AOC) subject to the Site Management Plan (SMP) are illustrated on **Figure 2**.

The tracts of land which make up the SMC facility and the former Al-Tech site were formerly owned and operated by a single owner, Allegheny Ludlum Industries, Inc., which utilized the properties for the manufacturing of steel products. Construction on the SMC facility began in 1956.

In 1976, Allegheny Ludlum Industries, Inc. conveyed the Al-Tech Site to Al-Tech Specialty Steel Corporation and retained title to the Forge facility (SMC facility). SMC obtained title to the Forge facility in 1983 by deed from Allegheny International Inc. (formerly known as Allegheny Ludlum Steel Corporation and Allegheny Ludlum Industries, Inc.).

SMC filed a Chapter 11 bankruptcy petition on March 27, 2002 and emerged from bankruptcy on November 26, 2003. On May 25, 2006, Precision Castparts Corporation completed its acquisition of SMC.

In 2006, during an expansion of the western end of the manufacturing building, impacted soil was encountered in utility trenches. The primary contaminants of concern were polychlorinated bi-phenyls (PCBs).

2.2 INVESTIGATION AND REMEDIAL HISTORY

In February 2007 SMC and NYSDEC signed an Order on Consent (No. B9-0737-07-02) for remediation of the Area of Concern (AOC)(Site) which is an area approximately 2-acres in size at the southwestern corner of the 8-acre facility (**Figure 2**). That same year, SMC completed an Interim Remedial Measure (IRM) to remediate the impacted soils of the AOC. The IRM work included excavation and off-site disposal of PCB-impacted (≥ 10 PPM) soils at six excavation sites within AOC. A total of approximately 6,700 tons of PCB-impacted soils were removed from the Site and disposed as hazardous waste at the Chemical Waste Management facility in Model City, New York. Remedial excavations were backfilled with clean crushed stone supplied by Buffalo Crushed Stone's Wehrle Drive



Pit. The excavations were backfilled to existing ground surface and were resurfaced with asphalt pavement and/or top soil with grass cover.

Soils containing PCBs at concentrations greater than the Soil Cleanup Objective for Industrial Site use (ISCO) (25 PPM) remain on site at a few locations within the AOC. The locations of the remaining impacted soils are where IRM excavations were terminated because of physical limitations posed by existing site buildings and/or the western property boundary. The remaining soil contamination of the AOC is not volatile and is located beneath the cover system.

SMC has achieved the Remedial Action Objectives of the Consent Order by reducing the volume of contaminated soil present at the AOC and reducing potential impacts to human health and the environment.

The SMP was approved by the NYSDEC on May 2, 2014 and addresses impacted soil and/or groundwater, if encountered, during construction or excavation activities.

Since soils containing contaminants at concentrations greater than the cleanup objective remain on the Site, Institutional Controls (ICs) and Engineering Controls (ECs) were implemented to protect public health and the environment. A detailed discussion of the ICs and ECs is provided in the SMP. IC/ECs are summarized in section 4.1.

3.0 EVALUATION OF REMEDY PERFORMANCE, EFFECTIVENESS, AND PROTECTIVENESS

GZA conducted semi-annual Site Inspection on May 18 and November 12, 2018 for the reporting period October 31, 2017 to February 8, 2019. Observations of the Site conditions were noted on an AOC Inspection Forms (**Appendix A**) and photo-documented. Photo logs from both inspections are provided in **Appendix B** and map showing the location and orientation of the Site photos are provided as **Figures 3A and 3B**. The site cover system was observed providing complete coverage of the Site and appears to be in good condition. The Site perimeter fence was in place and in good condition. The Site remedy, therefore, continues to be effective at meeting the Site RAOs for protection of Site users.

4.0 INSTITUTIONAL CONTROL/ENGINEERING CONTROL (IC/EC) PLAN COMPLIANCE REPORT

4.1 IC/EC REQUIREMENTS AND COMPLIANCE

IC/ECs for the site were determined by the NYSDEC and specified in the Environmental Easement (EE) signed by the NYSDEC on April 25, 2016. The IC/ECs are also included in the SMP which was prepared by GZA and approved by the NYSDEC on May 2, 2014. Complete lists of the Site IC and ECs are provided in Section 1.4.5 of the SMP. Summary lists of the ICs and ECs are provided below:



Summary of Site Institutional Controls:

- The Site may be used for commercial or industrial use in accordance with the SMP;
- Restriction of the use of groundwater as a source of potable or process water without necessary water quality treatment; and
- Compliance with the EE and SMP.

Summary of Site Engineering Controls:

- Cover System: The cover system is comprised of a minimum of 24 inches of crushed stone covered by either clean topsoil, asphalt pavement, concrete-covered sidewalks, and/or concrete building slabs.
- Security Fence: The AOC and SMC facility are surrounded by a minimum 8-foot high chain link security fence, with the exception of a 60-foot section that is the main driveway access point to the SMC facility parking lot from Willowbrook Avenue in the southwestern corner of the property. The property is under video surveillance and a security guard is on duty 24-hours a day, seven days a week.

GZA observed the Site to be in compliance with the SMP. The IC/ECs remain in place and there are no active remedial systems requiring monitoring or operation and maintenance.

4.2 IC/EC CERTIFICATION

A blank Site-specific IC/EC Certification Form, for the reporting period of October 31, 2017 to February 8, 2019 was provided to SMC as an attachment to the February 27, 2019 Reminder Notice letter sent by the NYSDEC. This form has been completed by SMC as Site owner and Certified by GZA as Qualified Environmental Professional (QEP). The completed IC/EC Certification Form for this reporting period is provided in **Appendix C** of this PRR.

5.0 PRR CONCLUSIONS AND RECOMMENDATIONS

5.1 PRR CONCLUSIONS

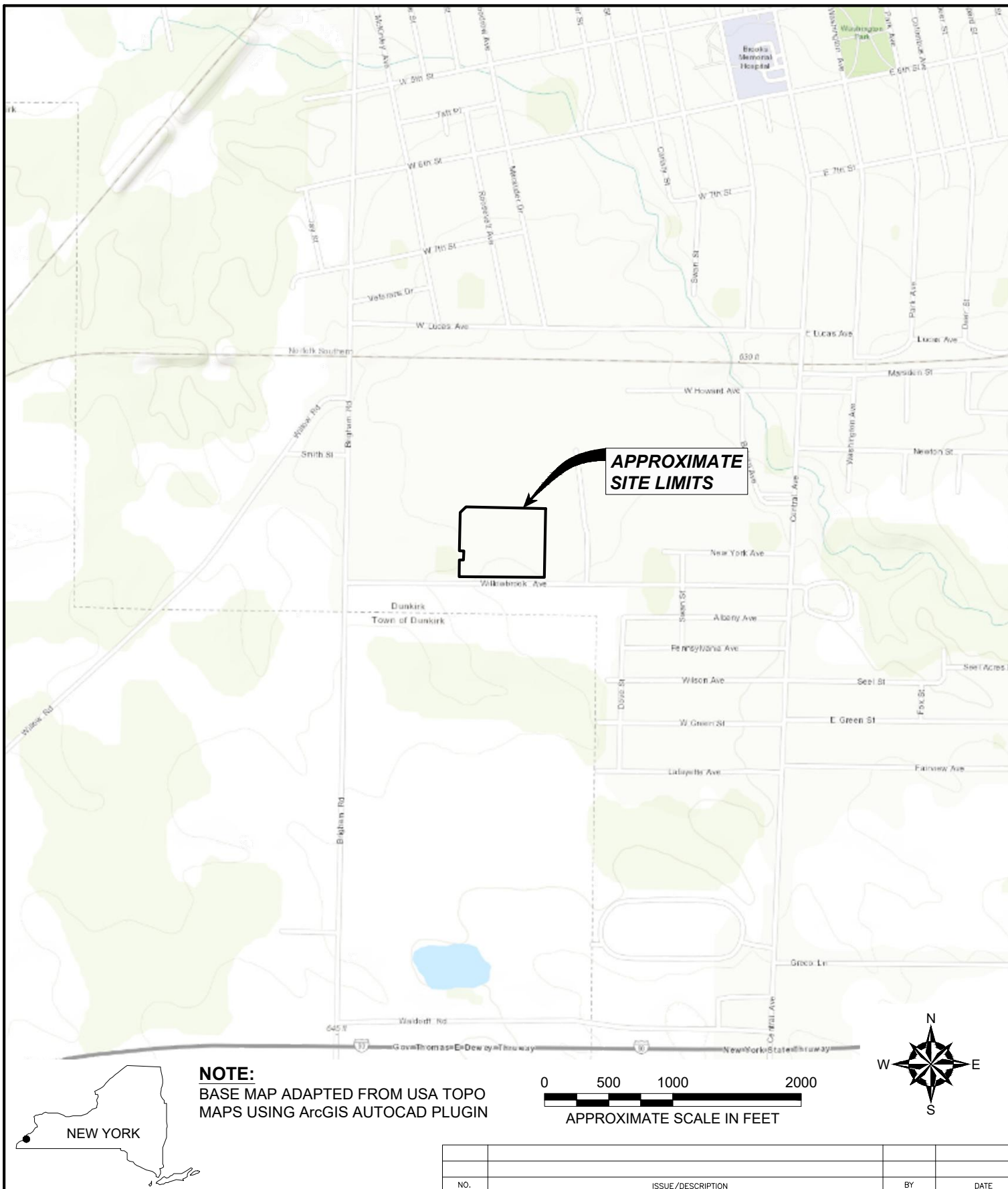
GZA confirms and hereby documents the IC/ECs to be in place, in good condition, and performing as intended.

5.2 PRR RECOMMENDATIONS

GZA and SMC recommend no changes to the SMP nor to the frequency of Site inspections and PRR submittals. Implementation of the SMP, including the Excavation Plan and maintenance of the Site cover system and perimeter fence will continue as required in the SMP. Per the SMP, the next semi-annual Site inspection is to be performed during the month of May 2019.



FIGURES



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PREPARED FOR:
SPECIAL METALS CORPORATION

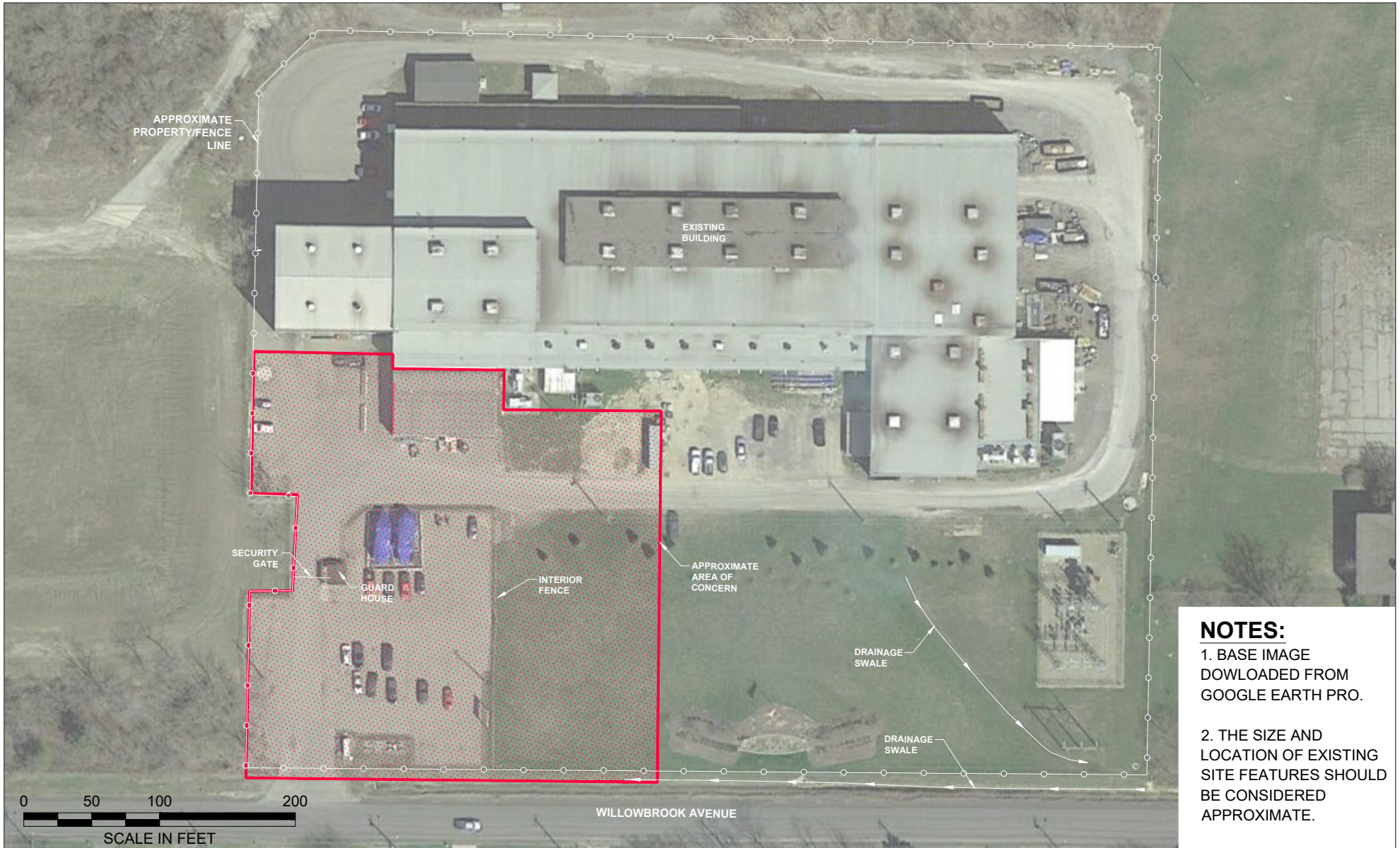
PROJ MGR:	TB	REVIEWED BY:	JJR	CHECKED BY:	BAK	DATE	FEBRUARY 2018	PROJECT NO.	21.0056196.50	REVISION NO.	
DESIGNED BY:	TB	DRAWN BY:	MDK	SCALE:	AS SHOWN						

SPECIAL METALS CORPORATION
100 WILLOWBROOK AVENUE
DUNKIRK, NEW YORK

SMP INSPECTIONS AND PRR REPORT

LOCUS PLAN


FIGURE
1

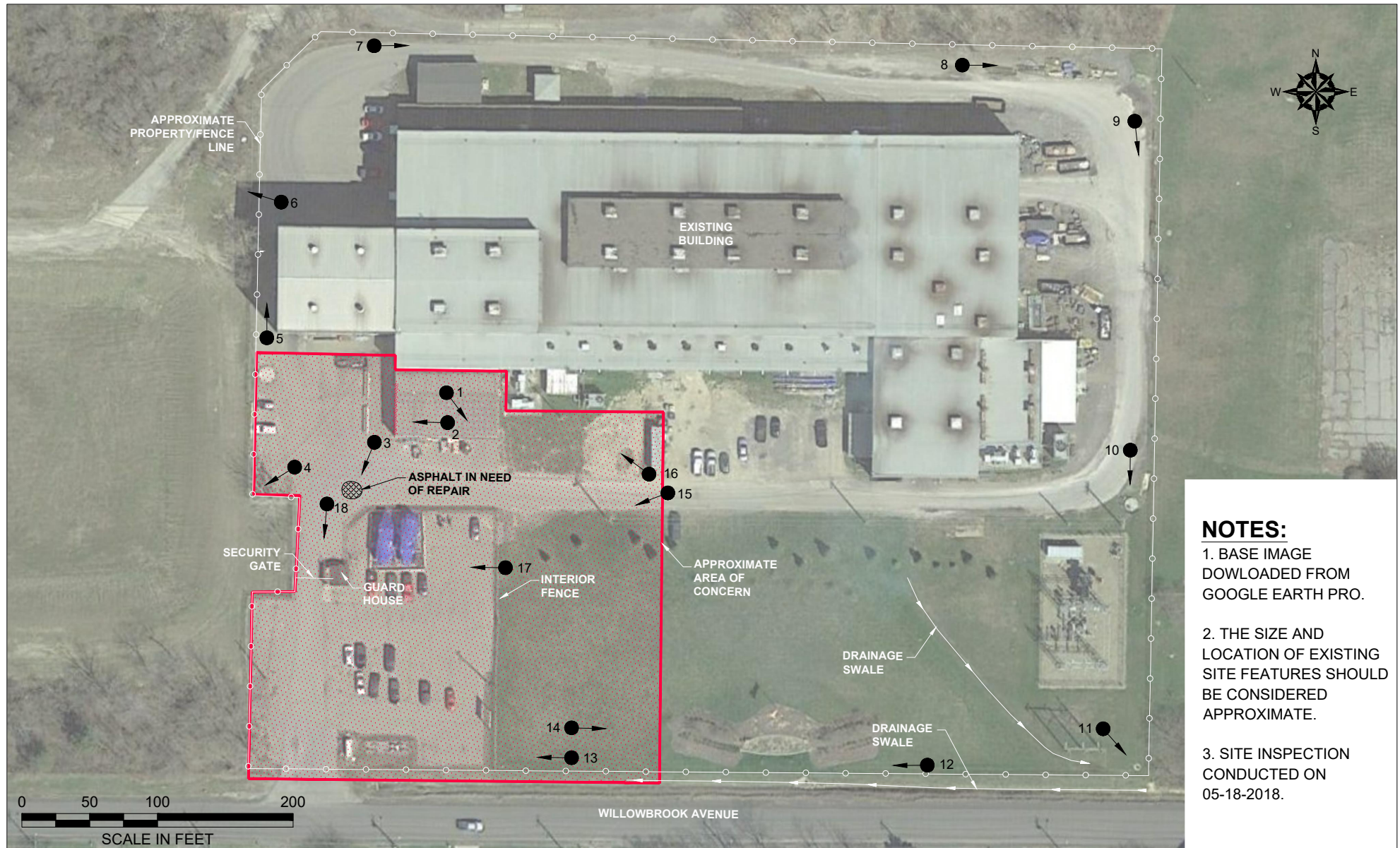


NOTES:

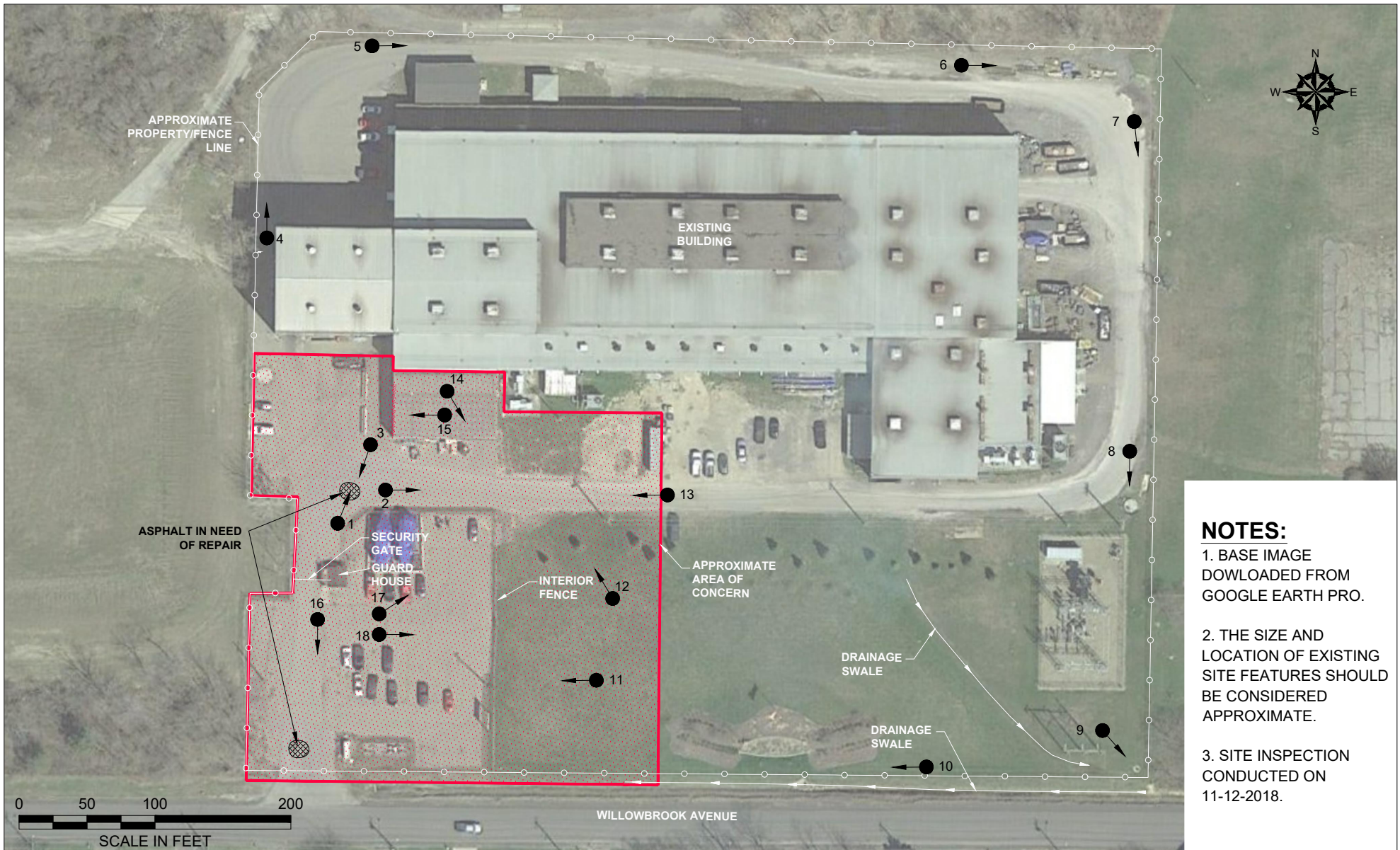
1. BASE IMAGE DOWNLOADED FROM GOOGLE EARTH PRO.
2. THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.

NO.	ISSUE/DESCRIPTION	BY	DATE
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SPECIAL METALS CORPORATION 100 WILLOWBROOK AVENUE DUNKIRK, NEW YORK		PREPARED BY:  GZA GeoEnvironmental of NY Engineers and Scientists www.gza.com		PREPARED FOR: SPECIAL METALS CORPORATION	
SMC FACILITY PLAN AND AREA OF CONCERN		PROJ MGR: TB	REVIEWED BY: BAK	CHECKED BY:	FIGURE 2
		DESIGNED BY: JR	DRAWN BY: MDK	SCALE: AS SHOWN	
		DATE: FEBRUARY, 2018	PROJECT NO. 21.0056196.50	REVISION NO.	



				SPECIAL METALS CORPORATION 100 WILLOWBROOK AVENUE DUNKIRK, NEW YORK				PREPARED BY:  GZA GeoEnvironmental of NY Engineers and Scientists www.gza.com				PREPARED FOR: SPECIAL METALS CORPORATION									
NO.		ISSUE/DESCRIPTION		BY		DATE		MAY 18, 2018 SITE INSPECTION PHOTO LOCATIONS				PROJ MGR: TB		REVIEWED BY: BAK		CHECKED BY:		FIGURE			
												DESIGNED BY: JR		DRAWN BY: MDK		SCALE: AS SHOWN				3A	
												DATE: MAY, 2018		PROJECT NO. 21.0056196.50		REVISION NO.					
<small>UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.</small>																					



- NOTES:**
1. BASE IMAGE DOWNLOADED FROM GOOGLE EARTH PRO.
 2. THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.
 3. SITE INSPECTION CONDUCTED ON 11-12-2018.

NO.	ISSUE/DESCRIPTION	BY	DATE

UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

<p>SPECIAL METALS CORPORATION 100 WILLOWBROOK AVENUE DUNKIRK, NEW YORK</p>	<p>NOV 12, 2018 SITE INSPECTION PHOTO LOCATIONS</p>
--	--

<p>PREPARED BY: GZA GeoEnvironmental of NY Engineers and Scientists www.gza.com</p>	<p>PROJ MGR: TB DESIGNED BY: JR DATE: NOVEMBER, 2018</p>	<p>REVIEWED BY: BAK DRAWN BY: MDK PROJECT NO. 21.0056196.50</p>
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<p>PREPARED FOR: SPECIAL METALS CORPORATION</p>	<p>CHECKED BY: SCALE: AS SHOWN REVISION NO.</p>	<p>FIGURE 3B</p>
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APPENDIX A AOC INSPECTION FORM

AREA OF CONCERN INSPECTION FORM
SITE MANAGEMENT PLAN
SPECIAL METALS CORPORATION
DUNKIRK, NEW YORK

NAME: <u>Jim Richert</u>	INSPECTION TIME <u>2:15 PM</u>	
DATE: <u>18-May-18</u>	WEATHER: <u>Sunny, 67 F, wind ENE at 15 to 20 MPH</u>	
VISUAL INSPECTION CHECKLIST		
Visually Inspected Area of Concern	<input checked="" type="checkbox"/> YES NO	
Photographic Documentation	<input checked="" type="checkbox"/> YES NO	
Is asphalt in parking lot in need of repair?	YES <input checked="" type="checkbox"/> NO If YES, explain in next section.	
Is asphalt inside security fence in need of repair?	<input checked="" type="checkbox"/> YES NO If YES, explain in next section.	
Is the security fence in need of repair?	YES <input checked="" type="checkbox"/> NO If YES, explain in next section.	
Is grass cover in need of repair?	YES <input checked="" type="checkbox"/> NO If YES, explain in next section.	
Is floor in Maintenance Shop in need of repair?	YES <input checked="" type="checkbox"/> NO If YES, explain in next section.	
Other issues of concern identified?	YES <input checked="" type="checkbox"/> NO If YES, explain in next section.	
Areas to be repaired are shown on attached figure	<input checked="" type="checkbox"/> YES NO	
AREAS IN NEED OF REPAIR		
Area discussed in this section must be shown on a figure and have photographic documentation.		
<p>One small area of asphalt located approximately 75-feet NNE of the guard house in need of repair.</p> <p style="text-align: center;">See Figure.</p>		
INTRUSIVE ACTIVITIES PLANNED FOR AREA OF CONCERN		
None	DATE	LOCATION
ADDITIONAL NOTES & COMMENTS		
Concrete floor of maintenance shop was repaired since the November 2017 inspection.		
Security fence is complete and in good condition.		
Healthy grass on soil cover system.		
See photo log.		

AREA OF CONCERN INSPECTION FORM
SITE MANAGEMENT PLAN
SPECIAL METALS CORPORATION
DUNKIRK, NEW YORK

NAME: <u>Jim Richert</u>	INSPECTION TIME <u>12:30: PM</u>
DATE: <u>13-Nov-18</u>	WEATHER CONDITIONS <u>41° F, overcast</u>
VISUAL INSPECTION CHECKLIST	
Visually Inspect Area of Concern YES	
Photographic Documentation YES	
Is asphalt in parking lot in need of repair?	NO If YES, expalin in next section.
Is asphalt inside security fence in need of repair?	Yes * If YES, expalin in next section.
Is the security fence in need of repair?	NO If YES, expalin in next section.
Is grass cover in need of repair?	NO ** If YES, expalin in next section.
Is floor in Maintenance Shop in need of repair?	NO If YES, expalin in next section.
Other issues of concern identified?	NO If YES, expalin in next section.
Areas to be repaired are shown on attached figure YES	
AREAS IN NEED OF REPAIR	
Area discussed in this section must be shown on a figure and have photographic documentation.	
* Minor pavement repairs are warranted at two locations in particular. See Figure 3B.	
** Snow cover on grassy areas only limited view of soil cover but no evidence of soil disturbance noted.	
INTRUSIVE ACTIVITIES PLANNED FOR AREA OF CONCERN	DATE
LOCATION	
N/A	
ADDITIONAL NOTES & COMMENTS	
Site cover system is in overall good condition and performing as intended.	
SMC stated that they intend to perform pavement repairs in spring of 2019.	




APPENDIX B PHOTOGRAPH LOG



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 1	Date: 5-18-18		
Direction Photo Taken: Southeast			
Description: Repaired concrete floor of maintenance Building.			

Photo No. 2	Date: 5-18-18	
Direction Photo Taken: West		
Description: Typical good condition of concrete floor in maintenance building.		



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 3	Date: 5-18-18		
Direction Photo Taken: South/Southwest			
Description: Area of asphalt pavement in need of repair.			

Photo No. 4	Date: 5-18-18	
Direction Photo Taken: Southwest		
Description: Monitoring well and fence corner NW of guard building.		



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 5	Date: 5-18-18		
Direction Photo Taken: North			
Description: Western Site perimeter fence.			

Photo No. 6	Date: 5-18-18	
Direction Photo Taken: Northwest		
Description: Locked gate along western perimeter fence.		



Photographic Log


Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 7	Date: 5-18-18		
Direction Photo Taken: East			
Description: Northern Site perimeter fence.			

Photo No. 8	Date: 5-18-18		
Direction Photo Taken: East			
Description: Northeastern corner of the site perimeter fence.			



Photographic Log


Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 9	Date: 5-18-18		
Direction Photo Taken: South			
Description: Northern portion of the eastern site perimeter fence.			

Photo No. 10	Date: 5-18-18		
Direction Photo Taken: South			
Description: Southern portion of the eastern site perimeter fence.			



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056190.50
Photo No. 11	Date: 5-18-18		
Direction Photo Taken: Southeast			
Description: Southeastern corner of the Site perimeter fence.			

Photo No. 12	Date: 5-18-18		
Direction Photo Taken: West			
Description: Central portion of the southern site perimeter fence.			



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056190.50
Photo No. 13	Date: 5-18-18		
Direction Photo Taken: West			
Description: Western portion of the southern site perimeter fence.			

Photo No. 14	Date: 5-18-18	
Direction Photo Taken East		
Description: Complete grass cover along southern portion of the Site cover system.		



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056190.50
Photo No. 15	Date: 5-18-18		
Direction Photo Taken: South/Southwest			
Description: View of Site cover system, both vegetated and paved surfaces at NE corner of cover.			

Photo No. 16	Date: 5-18-18	
Direction Photo Taken: Northwest		
Description: Monitoring well and cover system at NE corner of the cover system.		



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056190.50
Photo No. 17	Date: 5-18-18		
Direction Photo Taken: West			
Description: View of paved parking lot and guard building.			

Photo No. 18	Date: 5-18-18	
Direction Photo Taken: South		
Description: Guard building and paved site entrance.		



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 1	Date: 11-12-18		
Direction Photo Taken: NNE			
Description: Pavement in need of repair between security gate and the crib building.			
Photo No. 2	Date: 11-12-18		
Direction Photo Taken: East			
Description: Paved Site Road north of entrance parking lot.			



Photographic Log


Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 3	Date: 11-12-18		
Direction Photo Taken: South			
Description: Entrance road and security building.			

Photo No. 4	Date: 11-12-18	
Direction Photo Taken: North		
Description: Northwest corner of perimeter fence.		



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 5	Date: 11-12-18		
Direction Photo Taken: East			
Description: Western half of the northern perimeter fence.			

Photo No. 6	Date: 11-12-18	
Direction Photo Taken: ENE		
Description: Northeastern corner of perimeter fence.		



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 7	Date: 11-12-18		
Direction Photo Taken: South			
Description: Northern half of the eastern perimeter fence.			

Photo No. 8	Date: 11-12-18		
Direction Photo Taken: South			
Description: Southern half of the eastern perimeter fence.			



Photographic Log


Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056196.50
Photo No. 9	Date: 11-12-18		
Direction Photo Taken: Southeast			
Description: Southeastern corner of the perimeter fence.			

Photo No. 10	Date: 11-12-18	
Direction Photo Taken: West		
Description: Eastern half of the southern perimeter fence.		



Photographic Log


Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056190.50
Photo No. 11	Date: 11-12-18		
Direction Photo Taken: West			
Description: Snow covered soil cover system. Mowed grass observed at several location. No evidence of incomplete vegetative cover or exposed soil.			

Photo No. 12	Date: 11-12-18	
Direction Photo Taken: Northwest		
Description: View of soil cover system from another angle.		



Photographic Log

Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056190.50
Photo No. 13	Date: 11-16-17		
Direction Photo Taken: West			
Description: Site road.			

Photo No. 14	Date: 11-12-18	
Direction Photo Taken Southeast		
Description: Concrete floor of crib building.		



Photographic Log


Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056190.50
Photo No. 15	Date: 11-12-18		
Direction Photo Taken: West			
Description: Another view of concrete floor of crib building.			

Photo No. 16	Date: 11-12-18	
Direction Photo Taken: South		
Description: Site entrance with small area of pavement in need of repair.		



Photographic Log


Client Name: Special Metals Corp.		Site Location: SMC Facility, Dunkirk, NY	Project No. 21.0056190.50
Photo No. 17	Date: 11-12-18		
Direction Photo Taken: ENE			
Description: Parking lot.			

Photo No. 18	Date: 11-12-18	
Direction Photo Taken: East		
Description: Parking Lot.		



APPENDIX C IC/EC CERTIFICATION FORM



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site No. 907031 **Site Details** **Box 1**

Site Name Special Metals Corporation

Site Address: 100 Willowbrook Avenue **Zip Code:** 14048

City/Town: Dunkirk

County: Chautauqua

Site Acreage: 2.000

Reporting Period: October 31, 2017 to February 8, 2019

	YES	NO
1. Is the information above correct?	X	<input type="checkbox"/>

If NO, include handwritten above or on a separate sheet.

2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? (See section 12.8 of approved FER)	X	<input type="checkbox"/>
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3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	<input type="checkbox"/>	X
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4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	<input type="checkbox"/>	X
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If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.

5. Is the site currently undergoing development?	<input type="checkbox"/>	X
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Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial	X	<input type="checkbox"/>
7. Are all ICs/ECs in place and functioning as designed?	X	<input type="checkbox"/>

**IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

Description of Institutional ControlsParcel

96.10-1-2

Owner

David Murray, Mgr. of Env. Affairs

Institutional Control

Ground Water Use Restriction
Soil Management Plan
Landuse Restriction
Building Use Restriction
Site Management Plan
IC/EC Plan

The Area Of Concern has a series of Institutional Controls in the form of site restrictions. Adherence to these Institutional Controls is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are:

- Vegetable gardens and farming, including cattle and dairy farming, on the property are prohibited;
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended purpose;
- Future activities on the property that will disturb remaining contaminated material are prohibited unless they are conducted in accordance with this SMP;
- The property may only be used for commercial and/or industrial use provided that the long-term Engineering and Institutional Controls included in this SMP are employed.
- The property may not be used for a less restrictive use without additional remediation or an amendment of the Environmental Easement.

Box 4**Description of Engineering Controls**Parcel

96.10-1-2

Engineering Control

Cover System
Fencing/Access Control

Cover System comprised of a minimum of 12 inches of crushed stone covered by either clean topsoil, asphalt pavement, concrete-covered sidewalks, and/or concrete building slabs.

Site Security System comprised of a minimum 8-foot high chain link security fence around the Area Of Concern and SMC facility with the exception of a 60-foot section that is the main driveway access point to the SMC facility parking lot from Willowbrook Avenue in the southwestern corner of the property.

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

- a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;
- b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

X ☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

- (a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;
- (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;
- (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;
- (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and
- (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

X ☐

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. 907031

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Michael Guziec at 100 Willowbrook Avenue Dunkirk, NY 14048
print name print business address

am certifying as Owner (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.


Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

3/8/19
Date

IC/EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I BART A. KLETTKE at 300 PEARL STREET, SUITE 700, BUFFALO, NY 14202.
print name print business address

am certifying as a Qualified Environmental Professional for the SPECIAL METALS CORPORATION
(Owner or Remedial Party)

Bart A. Klettke
Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification



Stamp
(Required for PE)

3-11-19
Date



GZA GeoEnvironmental, Inc.